



COUNTY OF SACRAMENTO

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July 1, 1998

CALFED Bay-Delta Program
1416 Ninth Street, Room 1155
Sacramento, California 95814
Attn: Mr. Rick Breitenbach

Dear Mr. Breitenbach:

Subject: Comments on the CALFED Draft EIS/EIR Regarding Impacts of the Proposed Project within Sacramento County

Sacramento County has reviewed CALFED's *Draft Programmatic Environmental Impact Statement/Environmental Impact Report (EIR/EIS)* and submits the following comments:

Socioeconomic Impacts on Delta Communities

We strongly urge CALFED to expand its analyses to include a balanced assessment of the social, as well as the economic, impacts of the proposed program on Delta communities. Agriculture, tourism and recreation all serve to help sustain these communities. A comprehensive analysis must, at a minimum, include both the positive and negative impacts to these lifestyles and businesses within these communities.

The loss of prime agricultural lands that is proposed by the CALFED program may threaten the unique, bucolic way of life of the Sacramento-San Joaquin River Delta. Area residents have expressed serious concerns regarding the very large acreage and the sizable percentage of agricultural lands that will be lost to fallowing, shifted to wildlife habitat, and to the direct "footprint" impacts of CALFED projects. Residents also believe unknown further reductions in agricultural lands could occur if uses are restricted by endangered species that may be attracted by proposed habitat management practices. And, the expected increase in the cost of water supplies and increased competition resulting from the proposed free market for water is likely to further reduce the viability of farming in the Delta.

The traditional agrarian way of life is already threatened in California due to other factors. CALFED's choice of alternatives could exacerbate the fragile condition of agriculture as a result of other pressures and program objectives.

Tourism and recreation also play an important role in these small town Delta communities. Activities such as sightseeing, shopping, boating, fishing, cycling, wind surfing, etc. all support

Mr. Rick Breitenbach - Comments on the CALFED Draft EIS/EIR

Page 2

July 1, 1998

the local economy. Tourism and recreational opportunities may potentially emerge as a result of the CALFED actions. Net impacts need to be carefully considered.

Potential Loss of Local Government Revenues due to State/Federal Acquisition of Delta Lands for Habitat Restoration and Enhancement.

The County is concerned that any of the three proposed CALFED Program alternatives would greatly reduce the acreage of lands being farmed in Sacramento County, and would reduce funding for local government activities. The extensive program of habitat restoration and enhancement proposed by CALFED would remove tens of thousands of acres of presently farmed lands from private ownership.

The direct impacts of this conversion of farmlands upon the agricultural community and economy are addressed in the EIS/EIR. However, the EIS/EIR does not specifically address the resulting significant reduction in the property-based tax and assessment revenues of a range of local government entities that serve areas of the Sacramento-San Joaquin Delta. Where such private-to-public land transfers have occurred, no replacement funding has been provided.

County staff met with CALFED staff on this issue of potential revenue loss, and learned the following:

- Due to the broad scope of the Programmatic EIS/EIR, this potential fiscal impact has not been specifically identified and addressed.
- However, similar types of third party impacts (increased costs of social services, for example) are identified in the EIS/EIR discussion of program impacts upon agricultural resources and the agricultural economy. The EIS/EIR proposes mitigation strategies that include "continuing the flow of property tax revenues for the local counties" and "compensating local governments".
- Final mitigation measures need to be identified and approved by responsible agencies as specific projects are formulated and proceed through subsequent environmental review.

Since the CALFED program is at a key stage of formulation and approval, Sacramento County recommends that the program mitigation strategy include measures to mitigate the fiscal impact upon third-party public agencies of the proposed removal of private lands from tax and assessment rolls. We note that CALFED Solution Principal #6 states that program solutions should "have no significant redirected impacts." In-lieu payments to local governments by the state or federal governments seem the most likely means of mitigating these potential fiscal impacts.

July 1, 1998

Coordination with Local Flood Control Needs

CALFED Program Alternatives 2 and 3 could include:

- the construction of setback levees or channel enlargements along the North and South Forks of the Mokelumne River -- to improve the capacity of these channels to convey high-quality water to the South Delta pumping plants
- flooding of some islands in the North Delta -- to restore tidal and non-tidal wetland habitat.

An incidental benefit of the conveyance improvements (possibly aided by the flooding of some islands) is that flood levels in the North Delta would be lowered significantly. Sacramento County is concerned about the flooding threat in the Beach-Stone Lakes area, and has considered a broad range of potential flood-hazard mitigation measures. It appears that no comprehensive structural project is feasible unless downstream hydraulic impacts can be mitigated.

Recently, County staff has proposed integrating such a Local Project to protect the Beach-Stone Lakes area with the CALFED Program conveyance improvements in the North Delta. The CALFED Program provides the opportunity to mitigate the downstream impacts of protecting the Beach-Stones Lakes area from flooding.

The County urges that final formulation of CALFED projects consider integrating a flood protection project for the Beach-Stone Lakes area, so that cumulative hydraulic impacts are positive or neutral.

Increased Competition and Costs for Surface Water Supplies

Water transfers are proposed as one of the six elements that are common to all three CALFED program alternatives. CALFED's position is stated on page 10 of the Executive Summary: "[The] Water Transfers [element] will result in a more effective and protective water transfer market that will provide critical ecosystem flows without regulatory action and will result in a reduction of drought-induced economic damage."

Unincorporated Sacramento County is one of the inland communities faced with increasing demand for surface water supplies to serve the needs of a growing population, and the County is therefore engaged in efforts to increase long-term, dependable surface water supplies. Replacing the historical system of surface water allocation with an unconstrained, very efficient water transfer market will very likely increase the cost of future water supplies for this community.

However, any viable long-term solution to Bay-Delta problems will likely include increased water transfers. Therefore, increased costs for water supplies are unlikely to be avoided if CALFED objectives are to be met.

Mr. Rick Breitenbach - Comments on the CALFED Draft EIS/EIR

Page 4

July 1, 1998

The County looks forward the reissuance of the DEIS/DEIR for the CALFED program, and is especially concerned that the reissued document identify more specific mitigation for program impacts. If you have any questions regarding these comments, please contact Robert Shanks at 874-8239.

Sincerely,



Robert P. Thomas
County Executive

RT:CC

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